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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

IN RE: GEORGE EASF SHAHEEN,

Debtor.

Case No. 11-31102-KRH
Chapter 7

**NOTICE OF TRUSTEE'S MOTION TO APPROVE COMPROMISE
WITH GLORIA DEAN SHAHEEN AND GEORGE EASF SHAHEEN**

PLEASE TAKE NOTICE that Lynn L. Tavenner, Trustee for the Bankruptcy Estate of George Easf Shaheen (the "Trustee"), by counsel, has filed the *Trustee's Motion to Approve Compromise with Gloria Dean Shaheen and George Easf Shaheen* (the "Motion"). The Motion is on file in the office of the Clerk of the United States Bankruptcy Court for the Eastern District of Virginia, Richmond Division, United States Courthouse, 701 East Broad Street, Richmond, Virginia and may be reviewed by any party in interest during normal business hours. You may also review the Motion via the Internet at <http://vaeb.uscourts.gov> or by contacting the attorney below.

On February 21, 2013, the Trustee filed a Complaint (the "Avoidance Action") against Mrs. Shaheen, seeking to, among other things, avoid two transfers: (i) an alleged gift to Mrs. Shaheen in the form of a Venture Annuity issued by John Hancock Life Insurance Company (Account No. 2627691) valued at approximately \$161,847.00 (the "Annuity" or "Annuity Transfer"); and (ii) an alleged transfer to Mrs. Shaheen when the Debtor used a distribution from his individual retirement account to purchase a Certificate of Deposit (the "CD") with Virginia Commonwealth Bank (Account No. 820013506)¹ in the name of the Debtor and Mrs. Shaheen, jointly (the "CD" or "CD Transfer").

The Trustee also objected to various exemptions asserted by the Debtor, including the exemption of various retirement funds valued at approximately \$1.8 Million. Finally, the Trustee sought recovery of the Debtor's 30.5% interest in GDS & Associates, LLC, a single-asset entity which owns an unencumbered piece of property in Virginia Beach (the "Membership Interest"). The parties have reached an agreement regarding these matters. Pursuant to the agreement, the Trustee will retain the proceeds received in connection with the CD, which is valued at \$82,003.00, receive the proceeds from the Annuity in the amount of approximately \$123,997.03 and receive payment of \$245,000.00.

¹ The other half of the CD Transfer was previously turned over to the Trustee.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one). If you do not want the court to grant the relief sought in the Motion, or if you want the court to consider your views on the Motion, then you or your attorney must:

1. File with the court, at the address shown below, a written response pursuant to Local Bankruptcy Rules 9013-1 *no later than twenty-one days (21) after the filing of the Motion.*

Clerk of the Court
United States Bankruptcy Court
701 East Broad Street
Richmond, Virginia 23219

2. You must also mail a copy to:

Jeremy S. Williams, Esquire
Kutak Rock LLP
1111 East Main Street, Suite 800
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3. No hearing has been scheduled in this matter. If you timely file an objection, a hearing will be scheduled and separate notice regarding such hearing will be provided. If you fail to file a timely objection and attend the hearing, the Court may consider any objections you have waived and enter an order granting the relief sought.

LYNN L. TAVENNER, TRUSTEE

By /s/ Jeremy S. Williams
Counsel

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on October 2, 2014, a true and exact copy of the foregoing was served via electronic mail and first-class mail on the following parties and all creditors pursuant to the attached service list:

Counsel for Defendant:

Bruce H. Matson

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Debtor and Defendant:

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/s/ Jeremy S. Williams

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